

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

DEPUTY CLERK

UNITED STATES OF AMERICA

v.

JESSICA ROXANNA WHEELER (1)
EDWARD LEE WHEELER, JR. (2)

5-20CR0089-H
No. _____

INDICTMENT

The Grand Jury Charges:

Count One

Receipt and Distribution of Child Pornography
(Violation of 18 U.S.C. §§ 2252(a)(2), (b), and 2)

From in or about January 2020, to in or about June 2020, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Jessica Roxanna Wheeler** and **Edward Lee Wheeler, Jr.**, defendants, did knowingly receive and distribute a visual depiction, and aid and abet the receipt and distribution of said visual depiction, that had been shipped and transported using any means and facility of interstate and foreign commerce, had been shipped and transported in and affecting interstate and foreign commerce, and was produced using materials which had been mailed and shipped and transported using any means and facility of interstate and foreign commerce, including by computer; and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, that is: the lascivious exhibition of the genitals and pubic area of said minor, and such visual depiction was of such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(2), 2252(b), and 2.

Jessica Roxanna Wheeler and Edward Lee Wheeler, Jr.
Indictment - Page 1

Forfeiture Notice
(18 U.S.C. § 2253)

Upon conviction of the offense alleged in Count One, and pursuant to 18 U.S.C. § 2253, defendants **Jessica Roxanna Wheeler** and **Edward Lee Wheeler, Jr.**, shall forfeit to the United States of America: (a) any visual depiction described in Section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110, and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110; (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from any offense alleged in Count One; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of any offense alleged in Count One, and any property traceable to such property. The above-referenced property subject to forfeiture includes, but is not limited to, one Motorola One Hyper cellular telephone, IMEI (SIM slot 1) 351623110699711, IMEI (SIM slot 2) 351623110699729; one LG LM-X320AMB, Serial Number 00VTJH0061004; one black Samsung cellular telephone, IMEI 352563110225910; and one Samsung Galaxy s10+ cellular telephone, IMEI 352695101823517; in the possession of law enforcement.

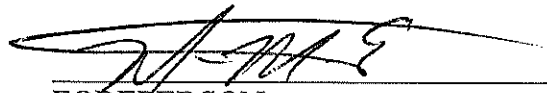
If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b) and by Title 28, United States Code, Section 2461(c).

A TRUE BILL



FOREPERSON

ERIN NEALY COX
UNITED STATES ATTORNEY



CALLIE WOOLAM

Assistant United States Attorney
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INDICTMENT

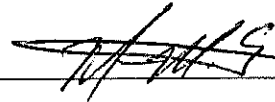
COUNT 1: RECEIPT AND DISTRIBUTION OF CHILD PORNOGRAPHY
Title 18, United States Code, Sections 2252(a)(2), 2252(b), and 2.

FORFEITURE NOTICE

(1 COUNT + FORFEITURE)

A true bill rendered,

Lubbock

 Foreperson

Filed in open court this 8th day of July, A.D. 2020

Clerk

Complaint No. 5:20-MJ-066 filed on June 25, 2020.
Defendants in federal custody,



UNITED STATES MAGISTRATE JUDGE